



DIVISION OF
ENFORCEMENT

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

VIA ECF

March 14, 2025

The Honorable Edgardo Ramos
United States District Court for the Southern District of New York
40 Foley Square, Courtroom 619
New York, New York 10007

Re: SEC v. Genesis Global Capital, LLC et al., No. 1:23-cv-287

Dear Judge Ramos:

Pursuant to Section 1.E of Your Honor's Individual Practices, the parties in the above referenced matter write jointly to respectfully request a 75-day extension of the deadline to complete fact discovery, from March 28, 2025, to June 11, 2025. To accommodate the proposed extension of fact discovery, the parties also request an adjournment of all subsequent discovery deadlines by 75 days.

Good cause exists to extend the current fact discovery deadline. On February 4, 2025, Gemini issued a second set of interrogatories and requests for admissions. The SEC's process for responding to these discovery requests requires additional time to solicit information from other offices and divisions. In addition, Gemini will require time to review the SEC's responses to the requests and consider whether to narrow or withdraw their request for a Rule 30(b)(6) deposition of an SEC witness. In addition, the SEC intends to take several additional depositions, and Gemini's lead counsel on this case has other significant trials set on April 21 and May 7. The parties request the proposed extension to provide adequate time to schedule and prepare for the remaining depositions.

An amended Civil Case Discovery Plan and Scheduling Order reflecting the proposed adjustments is attached hereto as Exhibit A. This is the parties' fifth request to extend the discovery deadlines in this case.

Respectfully submitted,

/s/ Edward J. Reilly
Edward J. Reilly
Counsel for Plaintiff Securities
and Exchange Commission

/s/ Andrew Bosse
Andrew Bosse
Counsel for Defendant Gemini
Trust Company, LLC

cc: All Counsel of Record (*via ECF*)